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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SITE MANAGEMENT PLAN, IMPLEMENTATION SCHEDULE,
HEALTH AND SAFETY PLAN AND ADDITIONAL ASSESSMENT USING INNOVATIVE
TECHNOLOGIES NS MAYPORT FL

11/20/1996

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 20, 1996

Mr. David Driggers
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC 29419-9010

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RE: Site Management Plan; Implementation Schedule; Health & Safety Plan: Additional Assessment Using Innovative Technology/Methodology at the SWMU 15 and Building 191 Area, ICON Environmental Services, NAVSTA Mayport

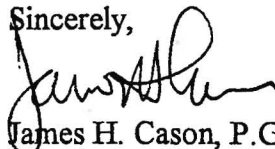
Dear David:

I have reviewed the above documents dated October 1996 (received November 13, 1996) and offer the following comments:

1. I note in the Health & Safety Plan (as in the IDW Plan) the proposed use of a PID at the drilling sites. Given that the contaminants at SWMU 15 are pesticides and metals, I fail to see the reasoning for the use of such methods, especially if used in a decision as to whether to upgrade to Level C protection.
2. In the transmittal letter, the contractor indicated that they will "field-test a prototype of the direct-push well in mid-November to allow refinement/redesign as may be necessary to ensure successful project implementation.." My impression during the conceptual reviews that I participated in was that the contractor already KNEW these techniques. If significant deviations from the previously stated well construction techniques are utilized, they must be reviewed by Martha Berry and myself. Finally, when the formal work plan is finished, it must be properly signed and sealed according to Florida law and reviewed by the Department.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-9994

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

Mr. David Driggers
November 20, 1996
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cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Satish Kastury, FDEP, Tallahassee
Jerry Young, City of Jacksonville

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